

Margaret M. Fox

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June 29, 2016

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Rate Floor Certifications for 2016 Pursuant to Federal Communications
Commission Regulation 47 C.F.R. §54.313(h)
Docket No. 2013-268-C

Dear Ms. Boyd:

Federal Communications Regulation 47 C.F.R. § 54.313(h) requires certain incumbent local exchange carriers to report rate floor data by July 1 of each year. Specifically, the FCC regulation requires as follows:

- (h) *Additional voice rate data.* (1) All incumbent local exchange carrier recipients of high-cost support must report all of their rates for residential local service for all portions of their service area, as well as state fees as defined pursuant to § 54.318(e), to the extent the sum of those rates and fees are below the rate floor as defined in § 54.318, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

The rate floor established pursuant to § 54.318 for the period beginning July 1, 2016 (rates in effect as of June 1, 2016) is \$21.93.¹ Thus, only incumbent local exchange companies that receive high-cost support *and* have rates below the \$21.93 rate floor are required to file a report.

¹ See Public Notice DA 16-362 in WC Docket No. 10-90 (rel. April 5, 2016); *see also* Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, *In the Matter of Connect America Fund, Universal Service Reform – Mobility Fund, ETC Annual Reports and Certifications, Establishing Just and Reasonable Rates for Local Exchange Carriers, and Developing an Unified Intercarrier Compensation Regime*, WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92, FCC 14-54 (rel. June 10, 2014), at ¶¶ 80 and 84 (The FCC waived the application of section 54.318(b) of its rules for lines reported July 1, 2016 with a rate of \$18 or above, but did not waive section 54.313(h) of the rules and, therefore, incumbent ETCs must report rates to the extent they fall below the announced urban rate floor of \$21.93).

COLUMBIA 1119386v4

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Suite 1600
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

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A copy of any required reports must be filed with the state commission. *See* 47 C.F.R. § 54.313(i). Attached please find the required information for the South Carolina Telephone Coalition companies listed in Attachment A.

The line count information reported by the companies is competitively sensitive information. Accordingly, a motion for confidential treatment accompanies this filing, and we are providing both public redacted and confidential versions of the filing.

If you should need further information, please do not hesitate to contact me.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

Enclosure

cc: Jeffrey M. Nelson, Esquire, ORS
Christopher Rozycki, ORS

South Carolina Telephone Coalition Member Companies
Rate Floor Certification 2016

Bluffton Telephone Company, Inc.

Farmers Telephone Cooperative, Inc.

Hargray Telephone Company, Inc.

Lockhart Telephone Company, d/b/a TruVista

McClellanville Telephone Company (TDS)

Norway Telephone Company (TDS)

Palmetto Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

Piedmont Rural Telephone Cooperative, Inc.

West Carolina Rural Telephone Cooperative, Inc.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2013-268-C

Re: Rate Floor Certifications for 2016 pursuant to Federal)
Communications Commission Regulation 47 C.F.R.)
§54.313(h))
_____)

MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL

The South Carolina Telephone Coalition (see attached list of companies) (“SCTC”) respectfully requests that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1. Incumbent local exchange carrier Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost support are required to report all of their rates for residential local service for all portions of their service area, as well as state fees as defined in rules promulgated by the Federal Communications Commission (“FCC”), to the extent the sum of those rates and fees are below the urban rate floor established by the FCC, and the number of lines for each rate specified. The rate floor that has been established by the FCC for purposes of this report for the July 1, 2016 filing is \$ 21.93.¹ The report is required to be filed with the FCC, the Universal Service Administrative Company (“USAC”), and the relevant state commissions or Tribal governments, as appropriate. *See* 47 C.F.R. § 54.313(i).

¹ See Public Notice DA 16-362 in WC Docket No. 10-90 (rel. April 5, 2016).
COLUMBIA 1167245v3

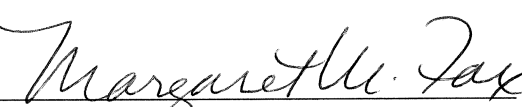
2. The rate floor data report contains line count information for various rates. This information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent.

3. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 
M. John Bowen, Jr.
Margaret M. Fox

ATTORNEYS FOR THE SOUTH CAROLINA
TELEPHONE COALITION

Columbia, South Carolina
June 29, 2016

South Carolina Telephone Coalition Member Companies
Rate Floor Certification 2016

Bluffton Telephone Company, Inc.

Farmers Telephone Cooperative, Inc.

Hargray Telephone Company, Inc.

Lockhart Telephone Company, d/b/a TruVista

McClellanville Telephone Company (TDS)

Norway Telephone Company (TDS)

Palmetto Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

Piedmont Rural Telephone Cooperative, Inc.

West Carolina Rural Telephone Cooperative, Inc.

Bluffton Telephone Company, Inc.

Rate Floor Certification and Data


Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Bluffton Telephone Company, Inc.

Signature of authorized officer  Date 06-13-2016

Printed name of authorized officer Andrew Rein

Title or position of authorized officer CFO

Telephone number of authorized officer: (843) 686-1246 ext.

Study Area Code of Reporting Carrier	240512	Filing Due Date for this form (mm/dd/yyyy)	07/01/2016
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REDACTED
RATE FLOOR DATA

Farmers Telephone Cooperative, Inc.

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Farmers Telephone Cooperative, Inc.**

Signature of authorized officer 

Date **June 10, 2016**

Printed name of authorized officer **Jeffrey L. Lawrimore**

Title or position of authorized officer **Chief Financial Officer**

Telephone number of authorized officer: **(843) 382-1381**, ext. _____

Study Area Code of Reporting Carrier **240520**

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2016

REDACTED
RATE FLOOR DATA

Hargray Telephone Company, Inc.

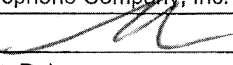
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Hargray Telephone Company, Inc.			
Signature of authorized officer 			Date 06-13-2016
Printed name of authorized officer Andrew Rein			
Title or position of authorized officer CFO			
Telephone number of authorized officer: (843) 686-1246 ext.			
Study Area Code of Reporting Carrier	240523	Filing Due Date for this form (mm/dd/yyyy)	07/01/2016

REDACTED
RATE FLOOR DATA

Lockhart Telephone Company, d/b/a TruVista


Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier					LOCKHART TELEPHONE COMPANY	
Signature of authorized officer						
Date				6-9-16		
Printed name of authorized officer					DAVID H. BRUNT	
Title or position of authorized officer					EXECUTIVE VP ADMINISTRATION & CFO	
Telephone number of authorized officer: (803) 581-9195 ext.						
Study Area Code of Reporting Carrier		240532		Filing Due Date for this form (mm/dd/yyyy)		07/01/2016

REDACTED
RATE FLOOR DATA

McClellanville Telephone Company (TDS)

Rate Floor Certification and Data

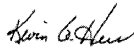
Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include the accuracy of the actual rate floor data reported; and to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **See TDS Telecom ILEC Listing Below**

Signature of Authorized Officer



Date 6/6/2016

Printed name of Authorized Officer

Kevin G. Hess

Title or position of Authorized Officer

Executive Vice President

Telephone number or Authorized
Officer.

(608)664-4160 ext. _ _ _ _

Study Area Code of Reporting Carrier

**See TDS
TELECOM
ILEC Listing
Below**

Filing Due Date for this form
(mm/dd/yyyy)

7/1/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

See attachment 1 for listing of TDS Telecom ILECs

Attachment 1

330856	Burlington, Brighton and Wheatland Telephone Company, LLC	330952	Southeast Telephone Co. of Wisconsin, LLC
250311	Oakman Telephone Company, Inc	361413	Mid-State Telephone Company dba KMP
452171	Arizona Telephone Company	287449	Myrtle Telephone Company, Inc
452174	Southwestern Telephone Company	150092	Edwards Telephone Company, Inc
542323	Winterhaven Telephone Company	150129	Township Telephone Company, Inc
320744	Camden Telephone Company, Inc	300662	The Vanlue Telephone Company
320809	Communications Corporation of Southern Indiana	432010	Mid-America Telephone, Inc
320816	S and W Telephone Company, Inc	522404	Asotin Telephone Company-WA
100005	Cobbosseecontee Telephone Company	240533	McClellanville Telephone Company, Inc
361362	Bridge Water Telephone Company	240535	Norway Telephone Company, Inc
532404	Asotin Telephone Company-OR	290559	Concord Telephone Exchange, Inc

REDACTED
RATE FLOOR DATA

Norway Telephone Company (TDS)

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include the accuracy of the actual rate floor data reported; and to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	See TDS Telecom ILEC Listing Below
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Signature of Authorized Officer	<i>Kevin G. Hess</i>	Date 6/6/2016
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Printed name of Authorized Officer	Kevin G. Hess
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Title or position of Authorized Officer	Executive Vice President
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Telephone number or Authorized Officer.	(608)664-4160 ext. _ _ _ _
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Study Area Code of Reporting Carrier	See TDS TELECOM ILEC Listing Below		Filing Due Date for this form (mm/dd/yyyy)	7/1/2016	
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Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

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320816	S and W Telephone Company, Inc	522404	Asotin Telephone Company-WA
100005	Cobbosseecontee Telephone Company	240533	McClellanville Telephone Company, Inc
361362	Bridge Water Telephone Company	240535	Norway Telephone Company, Inc
532404	Asotin Telephone Company-OR	290559	Concord Telephone Exchange, Inc

REDACTED
RATE FLOOR DATA

Palmetto Rural Telephone Cooperative, Inc.

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Palmetto Rural Telephone Cooperative, Inc.**

Signature of authorized officer



Date

6-3-16

Printed name of authorized officer

Jason J. Dandridge

Title or position of authorized officer

Chief Executive Officer

Telephone number of authorized officer

(843) 538-9090 ext.

Study Area Code of Reporting Carrier

240536

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2016

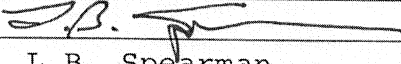
REDACTED
RATE FLOOR DATA

PBT Telecom, d/b/a Comporium
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	PBT Telecom, Inc.		
Signature of authorized officer			Date 6/21/2016
Printed name of authorized officer	L.B. Spearman		
Title or position of authorized officer	Vice President		
Telephone number of authorized officer:	803, 210 5528 ext.		
Study Area Code of Reporting Carrier	240539	Filing Due Date for this form (mm/dd/yyyy)	07/01/2016

REDACTED
RATE FLOOR DATA

Piedmont Rural Telephone Cooperative, Inc.

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Piedmont Rural Telephone Cooperative, Inc.**

Signature of authorized officer 

Date **6/10/16**

Printed name of authorized officer **Kara E. Horner**

Title or position of authorized officer **Director of Finance**

Telephone number of authorized officer: **(864) 682-3131**, ext.

Study Area Code of Reporting Carrier **240538**

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2016

REDACTED
RATE FLOOR DATA

West Carolina Rural Telephone Cooperative, Inc.

Rate Floor Certification and Data

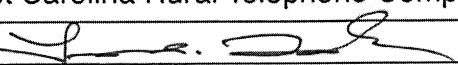
Pursuant to 47 C.F.R. §§ 54.313(h)

REDACTED
RATE FLOOR DATA

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier				West Carolina Rural Telephone Company, Inc.	
Signature of authorized officer				 Date 06/07/2016	
Printed name of authorized officer				Lance A. Tade	
Title or position of authorized officer				Chief Financial Officer	
Telephone number of authorized officer: () - - . ext.				864-446-9256	
Study Area Code of Reporting Carrier		240550	Filing Due Date for this form (mm/dd/yyyy)	07/01/2016	